

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Greenbelt Division)

RUDOLPH J. GEIST , *et al.*,)
Plaintiffs,)
v.)
HISPANIC INFORMATION &) Case No. 8:16-cv-3630
TELECOMMUNICATIONS NETWORK,)
INC.,)
Defendant.)

)

INITIAL JOINT STATUS REPORT

Pursuant to the Court's Scheduling Order dated April 17, 2018 (ECF 54) (the "Order"), Plaintiffs Rudolph J. Geist, RJGLaw LLC, and RJGLaw LLC, and Defendant Hispanic Information and Telecommunications Network Inc. (collectively, the "Parties") by and through their undersigned counsel, hereby submit their Initial Joint Status Report:

1. Requests for Modifications

The Parties jointly request the following modifications to the deadlines set forth in the Order (dates in brackets reflect the deadlines set forth in the Order):

June 29, 2018 [June 1, 2018]	Motion to amend the pleadings or for joinder of additional parties
July 16, 2018* [not specified]	Document production substantially completed
August 17, 2018* [not specified]	Fact depositions completed
August 20, 2018 [June 18, 2018]	Plaintiffs' Rule 26(a)(2) expert disclosures

* The Parties have included a deadline for this event although none is required by the Order in order to ensure the timely and efficient completion of discovery, but respectfully request permission to modify this deadline by agreement and without leave of Court.

September 21, 2018 [July 16, 2018]	Defendant's Rule 26(a)(2) disclosures
October 5, 2018 [July 30, 2018]	Plaintiffs' rebuttal Rule 26(a)(2)
October 31, 2018 [August 6, 2018]	Rule 26(a)(2) supplementation of disclosures and responses
October 31, 2018* [not specified]	Expert depositions completed
October 31, 2018 [August 30, 2018]	Completion of Discovery; submission of Post-Discovery Joint Status Report
November 7, 2018 [September 6, 2018]	Requests for admissions
November 30, 2018 [October 1, 2018]	Dispositive pretrial motions

As indicated, the Parties propose to extend the schedule in the Order by 61 days. The Parties believe such an adjustment is warranted considering the need to coordinate and obtain electronic and other discovery from the parties and certain third parties, as well as other needs of the case.

2. Report on Consent to Proceed Before a United States Magistrate Judge

The Parties do not consent to proceed before a Magistrate Judge.

3. Report on Mediation with a United States Magistrate Judge

The Parties are amenable to mediation but would respectfully prefer to proceed through a private mediator.

4. Report on the Scope of Discovery

The Parties expect to seek hard copy and electronic document discovery from one another and from third parties; deposition discovery from one another and from third parties; and limited expert discovery.

Without limiting their ability to seek all reasonable and appropriate discovery, the Parties anticipate at this time that discovery will likely focus on issues including the negotiation, terms, performance, and valuation of the Services Agreement and related agreements; the negotiation, terms, performance, and valuation of the relevant potential and actual transactions between HITN and Clearwire Corporation, including the existence and reasons for any "continu[ance] [of] the T2 Transaction negotiations from 2012 through 2016" as alleged in the Complaint;

HITN's "other current agreements" as specified in Section 1(b)(3) of the Services Agreement (ECF 26-1), and the forms of consideration thereunder; "Mr. Geist's standard arrangements with other holders of EBS spectrum licenses for whom he provided these services," as alleged in paragraph 22 of the Second Amended Complaint (ECF 41); and the agreements, transactions, and payments underlying Plaintiffs' alleged breaches of fiduciary duty and malpractice as asserted in Plaintiffs' sixth affirmative defense.

Dated: April 27, 2018

By: /s/ Benjamin G. Chew
Benjamin G. Chew (D. Md. Bar No. 14985)
BROWN RUDNICK
601 Thirteenth Street, N.W.
Suite 600
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
Email: bchew@brownrudnick.com

*Counsel for Plaintiffs Rudolph J. Geist and
RJG Law LLC and RJG LAW LLC*

By: /s/ Isaac Nesser
Isaac Nesser
QUINN EMANUEL URQUHART & SULLIVAN,
LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100
Email: isaacnesser@quinnmanuel.com

/s/ William Pittard
William Pittard, D. Md. Bar No. 16155
KAISER DILLON PLLC
1401 K Street, NW, Suite 600
Washington, DC 20005
Telephone: (202) 683-6150
Facsimile: (202) 280-1034
Email: wpittard@kaiserdillon.com

*Counsel for Hispanic Information and
Telecommunications Network, Inc.*